February 2, 1974

Mr. Thomas G. Giles Market Manager Robroy Industries River Road Verona, PA 15147

Dear Mr. Giles:

We have reviewed the request in your letter of January 22, 1974, for an interpretation as to whether the coated flexible steel casing described in your letter requires cathodic protection.

We find that no cathodic protection is required for this protective flexible steel casing because the casing is not considered part of a pipeline as that term is defined in Section 192.3 of the Federal safety standards. However, the mechanical connection between the plastic service pipe and steel fitting just above the ground level must comply with Section 192.281(e) of the Federal standards.

Thank you for your interest. We trust this answers your question satisfactorily.

Sincerely,

/signed/

Joseph C. Caldwell Director Office of Pipeline Safety Robroy Industries River Road Verona, PA 15147

January 22, 1974

Mr. Joseph C. Caldwell Director Office of Pipeline Safety 400 Sixth Street SW Room 107 Washington, D. C. 20590

Dear Mr. Caldwell:

Enclosed is information on the ROBROY RIZLER-FLEX as manufactured by ROBROY INDUSTRIES. We are requesting an interpretation of this product meeting the OPS regulations as set forth in Part 192 Minimum Federal Safety Standards.

RIZER-FLEX is a PVC plastic coated flexible steel casing that incorporates a compression service adapter to make the transition at ground level from the plastic service line to the conventional outside meter setting. RIZER-FLEX is designed to give protection to the plastic service line brought to the ground level. The riser eliminates the need for cathodic protection and the use of an underground fitting near the foundation wall. The flexible steel casing permits gradual bending of the plastic service pipe during installation and also compensates for ground movement caused by settling or "heaving".

The casing or conduit approach to protecting the plastic service line is similar to that taken by others. It is our understanding that you have recently reviewed and acknowledged this concept. We look forward to receiving your interpretation.

Very truly yours,

ROBROY INDUSTRIES
GAS PRODUCTS/COATINGS DIVISION

Thomas G. Giles Market Manager

**NOTE: DIAGRAM ATTACHED**